

EDOK Criminal Complaint (Revised 6/13)

# United States District Court

## EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

CHAD JON'DALE VOYLES,

*Defendant.*

### CRIMINAL COMPLAINT

Case No. 21-MJ-173-KEW


I, Kevin B. Hall, Jr., the undersigned complainant, state that the following is true to the best of my knowledge and belief.

On or about December 23, 2020, in the Eastern District of Oklahoma, in Indian Country, **CHAD JON'DALE VOYLES**, committed the crime of Murder in Indian Country, in violation of Title 18, United States Code, Sections 1111(a), 1151, and 1152.

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

(See attached Affidavit of Kevin B. Hall, Jr., which is attached hereto and made a part hereof by reference.)

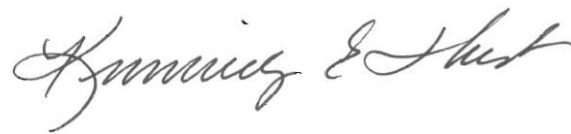
☒ Continued on the attached sheet.

  
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KEVIN B. HALL JR.  
Special Agent  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence at: MUSKOGEE,

OKLAHOMA Date: April 21, 2021

UNITED STATES MAGISTRATE JUDGE  
Name and Title of Judicial Officer

  
\_\_\_\_\_  
Signature of Judicial Officer



## **AFFIDAVIT**

I, Kevin B Hall, Jr., being duly sworn, does depose and state the following:

### **AGENT BACKGROUND AND INTRODUCTION**

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI) where I have been employed since September of 2015. I am an investigative officer, or law enforcement officer, of the United States of America within the meaning of Title 18, United States Code (U.S.C.), Section 2510(7), that is an officer of the United States who is empowered by law to conduct investigation of, and make arrests for, offenses enumerated in Title 18. In the course of my duties as special agent, I have investigated criminal violations related to Indian Country crimes, as explained in 18, United States Code (U.S.C.), 1151 and as it pertains to the Major Crimes Act (MCA). Further, I have investigated violent crimes, drug offenses, and child abuse crimes. Therefore, I, Kevin Hall, the undersigned complainant, state that the following is true to the best of my knowledge and belief:

### **PROBABLE CAUSE**

2. The statements contained in this Affidavit are based in part on information provided by other agencies, written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents; independent investigation; and my experience, training, and background as a Special Agent with the FBI. Because this Affidavit is being submitted for the limited purpose of establishing probable cause to believe that CHAD JON'DALE VOYLES committed the below-described offense, I have not included every detail of the investigation. In addition, unless otherwise indicated, all statements contained in this Affidavit are summaries in substance and in part.

3. As will be shown below, there is probable cause to believe that CHAD JON'DALE VOYLES committed the offense of Murder in Indian Country, in violation of Title 18, United States Code, Sections 1111(a), 1151, and 1152.

4. VENUE: The facts and circumstances alleged in this affidavit occurred in Fort Towson, Oklahoma, within the Eastern District of Oklahoma. The facts and circumstances occurred within the special maritime and territorial jurisdiction of the United States and in Indian Country, to wit the Choctaw Nation Reservation.

5. DEFENDANT: The defendant is CHAD JON'DALE VOYLES, hereinafter referred to as VOYLES.

6. VICTIM: The victim in this matter was CURTIS LEE MARTIN. For purposes of federal jurisdiction, CURTIS LEE MARTIN was an Indian and was an enrolled member by blood of the Choctaw Nation.

7. BACKGROUND: On or about December 23, 2020, Choctaw County Communications received a report of an overturned vehicle near a residence on N 2000 Road near Fort Towson, Oklahoma. Oklahoma Highway Patrol (OHP) Trooper Nathan Mullins and Choctaw County Sheriff's Office (CCSO) Deputy Ron Miller responded to the scene. Upon arrival, Trooper Mullins and Deputy Miller found the vehicle to be unoccupied. The vehicle was registered to CURTIS LEE MARTIN. Officers observed smoke originating from a residence north of the vehicle on E. 2000 Road, Fort Towson, Oklahoma.

8. Trooper Mullins and Deputy Miller attempted to make contact with the occupants of the residence on E. 2000 Road and discovered CURTIS LEE MARTIN deceased within the residence. Sheriff Terry Park of the CCSO contacted Oklahoma State Bureau of Investigation (OSBI) Special Agent Sonny Stewart and requested OSBI investigative assistance.

9. On or about December 23, 2020, the CCSO was contacted by D.S., a Facebook friend of A.N.R.M. D.S. reported he received Facebook Messenger messages from A.N.R.M. where A.N.R.M. said she had planned to kill her parents. A.N.R.M. said that her boyfriend, 15-year-old B.N.M. and their friend, CHAD JON'DALE VOYLES (hereinafter "VOYLES"), were going to help kill A.N.R.M.'s parents.

10. OSBI Agents located and interviewed VOYLES, who confessed to his involvement in the murder of CURTIS LEE MARTIN after waiving his *Miranda* rights and signing a *Miranda* waiver. VOYLES confessed to assisting in the cleanup of the crime scene that was the result of the murder of SHERRIE PYRON (hereinafter "PYRON"), A.N.R.M.'s mother. VOYLES also informed OSBI agents that VOYLES packed bats, knives, extra clothes, and a bow and arrow, the tip of which VOYLES replaced with razor blades. VOYLES admitted to hitting CURTIS LEE MARTIN with a baseball bat, and ultimately dousing CURTIS LEE MARTIN with gasoline and pouring gasoline on the stove before turning on all the burners. VOYLES confessed to agents that he wore two sets of clothes in preparation for the murder, and he hid some of the clothes along with the bow behind a shed on his property. At the conclusion of the interview, VOYLES was arrested and transported to the Choctaw County Jail.

11. On or about December 23, 2020, OSBI Special Agents Sonny Stewart and Chad Barnett observed A.N.R.M. and B.N.M. walking along Highway 147 southwest of the crime scene. A.N.R.M. and B.N.M. fled into a wooded area but were apprehended by the agents after a short foot pursuit.

12. OSBI Agent Stewart interviewed A.N.R.M. who waived her rights by signing a *Miranda* warning waiver and stated she had previously discussed killing her parents with B.N.M. and VOYLES. A.N.R.M. told Agent Stewart that on December 22, 2020, she told her mother, PYRON, she was pregnant. A.N.R.M. believed the child was B.N.M.'s, and after she told PYRON

about the pregnancy, A.N.R.M. and PYRON got into an argument. A.N.R.M. left the house and met up with B.N.M. and VOYLES. A.N.R.M., B.N.M. and VOYLES discussed killing CURTIS LEE MARTIN and PYRON.

13. A.N.R.M. told Agent Stewart she returned home, had a talk with PYRON and was no longer upset, but forgot to tell B.N.M. and VOYLES. A.N.R.M. said she took a shower later that evening and left the bathroom window open. While fixing her hair in the bathroom, B.N.M. and VOYLES climbed in through the window. VOYLES had a bat and a taser, and A.N.R.M. had a bat and a knife. A.N.R.M. told B.N.M. and VOYLES that PYRON was asleep on the couch.

14. A.N.R.M. stayed in the bathroom while B.N.M. and VOYLES went into the living room. A.N.R.M. could hear PYRON screaming while she was being hit with the bats. Eventually, A.N.R.M. stepped into the hallway and saw B.N.M. and VOYLES dragging PYRON'S bleeding body out of the back door of the house. A.N.R.M. said B.N.M. and VOYLES got the body outside and dug a hole. At some point, A.N.R.M. assisted B.N.M. and VOYLES with digging the hole by handing them a pickaxe.

15. A.N.R.M., B.N.M. and VOYLES went back into the house and cleaned up blood with bleach and mops. After they were done cleaning, A.N.R.M. made breakfast for B.N.M. and VOYLES. When they were done eating, A.N.R.M., B.N.M. and VOYLES went to a nearby abandoned house. Eventually, B.N.M. and VOYLES returned to A.N.R.M.'S home to wait on A.N.R.M.'S father, CURTIS LEE MARTIN, to come home. A.N.R.M. exchanged text messages and phone calls with VOYLES and B.N.M., and during one of the phone calls they told her, "it was done."

16. Later, B.N.M. came back to the abandoned house and told A.N.R.M. he wrecked the car, and VOYLES went home. Also, B.N.M. told A.N.R.M. that VOYLES had missed his shot and that B.N.M. and VOYLES burned CURTIS LEE MARTIN. A.N.R.M. and B.N.M. left the



abandoned house, walked through the woods, and eventually settled on hiding out in a van. A.N.R.M. told Agent Stewart she had contacted D.S. in attempt to get help with the murders of CURTIS LEE MARTIN and PYRON. A.N.R.M. said she hoped D.S., who lives in Weatherford, Texas would help get them out of Oklahoma.

17. B.N.M. was interviewed under Miranda in the presence of his biological mother, C.W., and provided information that A.N.R.M. was pregnant with his child, and CURTIS LEE MARTIN and PYRON did not like B.N.M.. B.N.M. told the OSBI Agents that A.N.R.M. and B.N.M. decided the only way they could be together and raise their child was to kill A.N.R.M.'S parents. B.N.M. told the OSBI Agents that PYRON was buried in the back yard of the A.N.R.M. residence.

18. Based upon information provided by B.N.M. and A.N.R.M., a clandestine grave containing the body of PYRON was found in the back yard of the A.N.R.M. residence.


19. On December 26, 2020, the Medical Examiner examined the bodies of PYRON and CURTIS LEE MARTIN and conducted an autopsy of both as well. The Medical Examiner concluded that PYRON died by homicide caused by multiple blunt force injuries. The Medical Examiner also concluded that PYRON suffered from multiple sharp force injuries. Likewise, the Medical Examiner concluded that CURTIS LEE MARTIN died by homicide caused by thermal burn injuries with smoke and soot inhalation. The Medical Examiner also determined that CURTIS LEE MARTIN suffered blunt force trauma of the head.

21. The facts presented in this affidavit are not a complete recitation of all the facts known to law enforcement; rather, the Affidavit is solely offered to establish probable cause for the crime presented in this Affidavit.

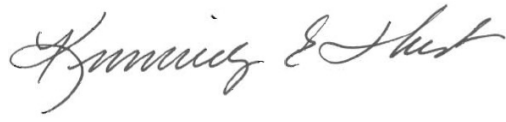
### CONCLUSION

22. Based on a review of this case, and based on my knowledge and experience with violent crime in Indian Country, I, as your Affiant have probable cause to believe that CHAD JON'DALE VOYLES committed the offense of Murder in Indian Country, in violation of Title 18, United States Code, Sections 1111(a), 1151 and 1152.

Respectfully Submitted,

  
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KEVIN B. HALL, JR.  
Special Agent, FBI

Sworn before me this 21st day of April 2021.

  
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UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF OKLAHOMA